

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re) Chapter 11
)
DIVINE CEMENT INC.,) Case No. 23-02422
)
Debtor.) Hon. A. Benjamin Goldgar
) Hearing Date: March 20, 2023
) Hearing Time: 9:30 a.m.

NOTICE OF MOTION

To: See Attached Service List

PLEASE TAKE NOTICE THAT on **March 20, 2023, at 9:30 a.m.**, I will appear before the Honorable A. Benjamin Goldgar, or any judge sitting in his place, **either** in Courtroom No. 642 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, Illinois 60604, **or** electronically as described below, and present ***Debtor's Motion for Extension of Time to File Balance of Schedules and Statement of Financial Affairs***, a copy of which is attached hereto.

All parties in interest, including the movant, may appear for the presentment of the motion either **in person in Room 642 or electronically** using Zoom for Government.

You may appear electronically by video or by telephone.

To appear by video, use this link: <https://www.zoomgov.com/join>. Then enter the meeting ID and passcode.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and password. The meeting ID for this hearing is **161 500 0972** and the Passcode is **726993**. The meeting ID and further information can also be found on Judge Goldgar's web page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

DIVINE CEMENT, INC., Debtor

By: /s/ Ariel Weissberg
One of its attorneys

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CERTIFICATE OF SERVICE

I, Ariel Weissberg, certify that on March 9, 2023, I caused to be filed ***Debtor's Motion for Extension of Time to File Balance of Schedules and Statement of Financial Affairs***. Notice of this filing was sent to all parties registered to receive notice in this case by electronic transmission through the court's CM/ECF system, including to the following parties:

Patrick S Layng, Esq.
M. Gretchen Silver, Esq.
Office of the United States Trustee
219 South Dearborn, Room 873
Chicago, Illinois 60604
Email: USTPRegion11.ES.ECF@usdoj.gov

Matthew D. Brash, Esq.
Newpoint Advisors Corporation
5600 N. River Road Suite 800
Rosemont, IL 60018
Email: mbrash@newpointadvisors.us
(Sub V Trustee)

Matthew L. Hendricksen, Esq.
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(for First Home Bank)

Amy N. Carollo, Esq.
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111 W. Jackson Blvd., Suite 1415
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Email: amyc@chilpwf.com
(for Chicago & Vicinity Laborers' District Council Pension Fund, et. al.)

Michael D. Leifman, Esq.
Vedder Price P.C.
222 North LaSalle Street, Suite 2600
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Email: mleifman@vedderprice.com
(for *Komatsu Financial Limited Partnership*)

Jeffrey A. Krol, Esq.
Johnson & Krol, LLC
311 S. Wacker Drive, Suite 1050
Chicago, IL 60606
Email: krol@johnsonkrol.com
(for *Pension Fund of Cement Masons' Union Local Union No. 502 et al.*)

/s/ Ariel Weissberg
Ariel Weissberg

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DIVINE CEMENT INC.,)	Case No. 23-02422
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Debtor.)	Hon. A. Benjamin Goldgar
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**DEBTOR'S MOTION FOR EXTENSION OF TIME TO FILE BALANCE OF ITS
SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS**

NOW COMES Debtor, Divine Cement, Inc. ("Debtor"), through its attorneys, Ariel Weissberg and the law firm of Weissberg and Associates, Ltd., and as *Debtor's Motion for Extension of Time to File Balance of its Schedules and Statement of Financial Affairs*, states as follows:

1. On February 23, 2023, the Debtor filed a voluntary petition in the United States Bankruptcy Court for the Northern District of Illinois, Eastern Division to initiate this Chapter 11 case under SubChapter V of the Bankruptcy Code.
2. Since the petition date, the Debtor has continued in the possession, management and operation of its assets, properties and business in accordance with Sections 1107 and 1108 of the Bankruptcy Code.
4. Debtor's balance of Schedules and Statement of Financial Affairs are due on March 9, 2023.
5. The First Meeting of Creditors is scheduled for March 29, 2023, at 1:30 p.m.
6. Through this Motion, Debtor is seeking an additional 14 days to file the balance of his Schedules and Statement of Financial Affairs through March 23, 2023.

7. This extension is needed because Debtor has substantial information to gather to complete these documents, and once this information is compiled, Debtor's representative must meet with counsel to carefully prepare the Schedules and Statement of Financial Affairs.

8. In light of the foregoing, this Court should grant this extension, especially since no party will be prejudiced by this extension.

WHEREFORE, Debtor, Divine Cement, Inc., prays that this Court extend the time for it to file the balance of its Schedules and Statement of Financial Affairs to March 23, 2023; and for such other and further relief as this court deems just and proper.

DIVINE CEMENT, INC., Debtor

By: /s/ Ariel Weissberg
One of its attorneys

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